

In the Matter of:

Maryland Department of the Environment

May 31, 2018

Public Hearing: Maryland Crematory, LLC

Condensed Transcript with Word Index



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<p>1 2 3 4 MARYLAND DEPARTMENT OF THE ENVIRONMENT 5 AIR AND RADIATION ADMINISTRATION 6 MARYLAND CREMATORY LLC 7 8 9 Date: May 31, 2018 10 11 Earleigh Heights Fire Station 12 161 Ritchie Highway 13 Severna Park, Maryland 21146 14 15 16 17 18 HEARING OFFICER: Shannon Heafey 19 20 21</p>	<p>3 1 P R O C E E D I N G S 2 - - - - - 3 (Hearing commenced at 6:30 p.m.) 4 MS. HEAFEY: Good evening, ladies and gentlemen. 5 It's going to turn pretty foul pretty quickly, so I'm going 6 to -- we'll catch up with anybody else who comes in later. 7 My name is Shannon Heafey. I'm the Air Quality 8 Permits Program Public Participation Coordination. I'm 9 going to read my statement. It's a little bit long. 10 Forgive me. But it gives a background for what we are doing 11 for this evening. 12 This hearing is being held for an Air Quality 13 Permit to Construct application submitted by Maryland 14 Crematory for the installation of one Classic X-Cel human 15 crematory to be located at 408 Headquarters Drive in 16 Millersville. Also here tonight from the Air Quality 17 Permits Program is Ms. Suna Sariscak, Chief of the Technical 18 Division, and Mr. Nolan Penney, the permit engineer for this 19 application. The company is represented tonight by Mr. Sean 20 Marshall. 21 The Department has made a tentative determination</p>
<p>2 1 Attendees: 2 3 Shannon Heafey, MDE 4 Nolan Penney, MDE 5 Jessica Zimmer 6 John Zimmer 7 Stephen Maggitti 8 Oliver Snyder 9 Kerry Doyle 10 Sean Marshall 11 Jen Whitlock 12 Karen Schaoba 13 Paul Kaup 14 Matthew Fernandez 15 Jennifer Fernandez 16 17 18 19 20 21</p>	<p>4 1 that the draft permit will meet all applicable air quality 2 rules and regulations and can be issued. This hearing is to 3 offer citizens the opportunity to formally comment on the 4 Department's tentative determination and draft permit 5 conditions. The comments may also be submitted in writing 6 to the Department after tonight's hearing. 7 The notification of this hearing appeared in the 8 Capital Gazette on May 11th and May 28th, 2018. A docket of 9 information containing the application, the tentative 10 determination, and draft permit conditions is at the Anne 11 Arundel Regional Library, 1010 Eastway in Glen Burnie, 12 Maryland. You can ask for Docket Number 16-17. 13 Statements entered into the record will be kept on 14 file at the Department for a minimum of five years. The 15 comment period will remain open through June 8th, 2018. 16 Citizens have the opportunity to request a one-time, 60-day 17 extension of the comment period, which must be requested in 18 writing to the Department no later than the close of the 19 current comment period, again, June 8th. And you can direct 20 it to my attention. I'll have my business cards at the back 21 table.</p>

<p>5</p> <p>1 If an extension request is received and the 2 comment period is extended, a notification will be sent to 3 those who have participated in the permit process and local 4 elected officials and will be posted on our website. At the 5 conclusion of the comment period, all comments received at 6 the public hearing and in writing will be reviewed and 7 addressed in a document called the Response to Comments. It 8 will be prepared by the Department and sent to the folks who 9 have made comments, and everyone else who has participated 10 in this process. It will also be added to the docket.</p> <p>11 If the Department does not receive any comments it 12 considers to be adverse to the tentative determination, that 13 determination will become the final decision at the end of 14 the comment period and the permit will be issued. If the 15 Department does receive comments deemed adverse to the 16 tentative determination, it will make a final determination 17 as to whether to issue or deny the permit. A notice of 18 final determination would be placed in the legal section of 19 a newspaper of general circulation in the area, placed on 20 the MDE Air Quality Permitting webpage, and mailed to 21 commenters and those who have participated in the public</p>	<p>7</p> <p>1 able to go and follow up on what's happening at the library 2 with the docket. It will be updated periodically as we go 3 through the process.</p> <p>4 The hearing is going to proceed in the following 5 manner, following these ground rules. First, the order of 6 the statements, Mr. Penney will read his statement about the 7 tentative determination. So, again, Mr. Penney will make 8 his statement into the public record about the draft permit 9 conditions, fact sheet, tentative determination. Then I 10 will invite local elected officials who would like to make a 11 statement for the record. At that point, I will invite the 12 public to make comments. After comments have been recorded, 13 I will make a closing statement which will describe the 14 process from this night forward.</p> <p>15 The second is the basic rules of consideration. 16 Protesting will not be allowed in this room during the 17 hearing. Obviously, not applicable tonight. As 18 participants in this public hearing, please give the same 19 consideration to people making statements as you would 20 expect to when you're making your statement. Please do not 21 interrupt or talk over anyone giving testimony or applaud.</p>
<p>6</p> <p>1 participation process for this permit.</p> <p>2 Any person contending they will be adversely 3 affected by the Department's final determination may seek 4 remedy within the circuit court system of Maryland. A 5 petition for judicial review must be filed with the circuit 6 court for the county in which the proposed activity will 7 occur. In this case, it would be Anne Arundel. It must be 8 filed within 30 days after the publication of the notice of 9 final determination.</p> <p>10 This public hearing is being recorded. The 11 statements made here this evening will be included in the 12 formal record. Please submit written copies of your oral 13 statements if possible this evening. Or, please e-mail or 14 mail them to me after tonight's hearing. It helps to keep 15 the accuracy of the permanent record.</p> <p>16 Please take a moment before you leave to be 17 certain we can read your contact information, whether it's 18 your written address or your e-mail. It's the only way I'm 19 going to have to contact you. If I can't read it, you won't 20 be able to get a notification. If you've chosen not to sign 21 in tonight or leave your contact information, you will be</p>	<p>8</p> <p>1 Any such disruption may cause the court reporter to miss 2 part or all of a statement and will delay the continuance of 3 the hearing.</p> <p>4 Please refrain from personal attacks of any kind 5 against any person here this evening. Please keep your 6 statements to the topic of air pollution concerns on this 7 draft proposed permit. I will ask if anybody -- probably 8 not going to be a problem tonight, but I've had it in the 9 past, and if anybody were to do so, I would ask them to step 10 aside.</p> <p>11 So, the third is the order in which the statements 12 will be recorded. I will first invite, as I said, invite 13 the elected officials to make a statement. Then I will call 14 people who have indicated they signed in to make a 15 statement. After that, I'll invite anyone who had not 16 originally signed in to speak but would like to make a 17 statement to come up. And at the end of all of that, if 18 there was time, if we had a lot more speakers, I would 19 invite people to come back up and amend their statement. 20 But we are going to be in here, I guess we have the place 21 until about 8:00, 8:30. So, we should be fine. We don't</p>

<p>9</p> <p>1 have 900 people. You can take your time with your 2 statements. 3 Fourth is the presentation of the comments for the 4 formal record. When I call your name to make your statement 5 please state your name and spell it for the court reporter. 6 And if you use any abbreviations in your -- or acronyms in 7 your statement, please spell them out, again, for the court 8 reporter for accuracy of the record. 9 Please keep your comments on topic, that is, 10 please restrict your comments to matters of air quality and 11 the draft permit conditions for this proposed project. Any 12 comments made in the form of a question will be included 13 with all other formally made testimony and will not be 14 answered here tonight but will be addressed in that response 15 to comments document at the end of the comment period. 16 Oh, again, I said, if you have -- if you are 17 making statements tonight, you can leave me written copies, 18 that's fine. You can e-mail me if you want to add to a 19 statement, if you choose to make one tonight, or if you want 20 to add to any statement, just send to me via e-mail or hard 21 copy in the mail. That's all good.</p>	<p>11</p> <p>1 The Department's review process included 2 determinations of worst-case air emissions from the facility 3 combining both the proposed crematory and the existing 4 crematory, and determinations of the impact of those 5 emissions on ambient air quality. Emissions from the 6 combined proposed crematory and existing crematory were 7 projected based on U.S. EPA emissions factors established 8 for human cremation. The effects of the proposed facility's 9 emissions from the combined crematories on ambient air 10 quality were estimated using the U.S. EPA-approved Screen-3 11 computer model that provided conservative estimates on such 12 effects. 13 Details concerning the facility's emissions and 14 their impact on ambient air quality are provided in the 15 Department's Tentative Determination, which is included in 16 the docket that has been made available for public review 17 and is also at this hearing. 18 Based on the findings and determinations following 19 the review of the information provided with the application, 20 the proposed crematory can be expected to comply with all 21 applicable air pollution control regulations; therefore, the</p>
<p>10</p> <p>1 So, there's that. Nolan. 2 MR. PENNEY: Good evening. My name is Nolan 3 Penney, and I am the air quality permit engineer assigned to 4 review the application and draft the permit for the proposed 5 project. The Maryland Department of the Environment has 6 reviewed the application submitted by Maryland Crematory for 7 an air quality permit-to-construct that would authorize the 8 installation of a second crematory, a U.S. Cremation 9 Equipment "Classic" X-Cel human crematory. The proposed 10 installation will be located at 408 Headquarters Drive, 11 Suite 10, Millersville, Maryland, 21108, in Anne Arundel 12 County. 13 The proposed crematory is a multi-chamber unit 14 that has the capacity to cremate human remains at a rate of 15 approximately 400 pounds per hour and a maximum charge 16 capacity of approximately 1200 pounds. The proposed 17 crematory consists of a primary chamber, where combustion of 18 the human remains takes place, and a secondary chamber, 19 which provides the necessary conditions of residency time, 20 turbulence, and elevated temperature to assure control of 21 particulate matter, visible emission, and odors.</p>	<p>12</p> <p>1 Department has made a tentative determination that the 2 permit-to-construct, with enforceable conditions, can be 3 issued. In order to ensure consistent compliance with air 4 pollution control requirements, Maryland Crematory will be 5 required to do all of the following. 6 One, construct the new crematory with a stack 7 height of at least 27 feet above the ground and at least 11 8 feet above the roof peak. 9 Two, extend the existing crematory stack to the 10 same height of at least 27 feet above the ground and at 11 least 11 feet above the roof peak. 12 Three, construct the new crematory with secondary 13 chamber having an operating temperature of at least 1800 14 degrees Fahrenheit. 15 Four, construct the new crematory with a secondary 16 chamber having a retention time of at least two seconds. 17 Five, construct the new crematory with a 18 temperature chart recorder and a temperature sensor to 19 continuously monitor and record the temperature of the flue 20 gases leaving the secondary combustion chamber. 21 Six, prohibit the combustion of any halogenated</p>

<p>13</p> <p>1 plastics, including polyvinyl chloride (PVC) body bags and 2 PVC pipes in either crematory. 3 Seven, prohibit the combustion of hazardous waste, 4 or hospital, medical, or infectious waste in either 5 crematory. 6 Eight, limit the facility-wide cremation rate to 7 no more than ten cremations during any rolling eight-hour 8 period. 9 Nine, obtain a State permit-to-operate before 10 operating the new crematory after the initial 180-day 11 temporary operating period. 12 Ten, operate in compliance with all applicable 13 federal and state air quality regulations pertaining to 14 visible emissions, emissions of particulate matter, and 15 toxic air pollutants. 16 Eleven, operate so as to prevent discharges of 17 emissions that create a nuisance beyond property lines. 18 Twelve, annually certify in writing actual 19 emissions of regulated pollutants from the crematory. 20 Thirteen, maintain sufficient records to support 21 the annual certifications of emissions.</p>	<p>15</p> <p>1 have to come up here so the court reporter can hear you. 2 MR. MAGGITT: All right. 3 MS. HEAFEY: And, again, just state your name and 4 spell it, please. 5 MR. MAGGITT: Stephen Maggitti. Oh, right here. 6 Stephen with a P H. 7 COURT REPORTER: A N? 8 MR. MAGGITT: E N. Maggitti, M A G G I T T I. 9 We actually just moved into Shipley's Choice yesterday, so 10 this is very new. We first heard about it a couple hours 11 ago. And we just purchased a home on the western side of 12 the development, very close to the facility. I understand 13 that, you know, businesses have to run. Of course, I can't 14 really be happy about the idea of investing in a good 15 community and school and, you know, having human remains, 16 you know, being burned very close to our home. We're in one 17 of the areas that's -- it's on Moonflower Court. If you 18 look at a map, it's very close. 19 So, we'll be interested in finding out more about 20 it. But, of course, we certainly have concerns and hope 21 that we can get as much information as possible. And, you</p>
<p>14</p> <p>1 Fourteen, report all occurrences of excess 2 emissions. Thank you for your time. 3 MS. HEAFEY: Thank you. All right. If anyone 4 would like to make a statement at this time, you are more 5 than welcome to come up and speak toward the court reporter 6 so she can record your statements. Otherwise, you are, 7 again, welcome to send something to me in writing either 8 through the regular mail or through e-mail until June 8th. 9 And you have that one-time opportunity to request a 60-day 10 extension. Also, again, it must be in writing and sent to 11 my attention no later than June 8th. 12 So, if anyone would like to make a statement, you 13 are most welcome to come up. I didn't have anybody signed 14 up. 15 MR. ZIMMER: Can we ask questions? 16 MS. HEAFEY: No. What we -- excuse me. The 17 informational meeting would have been the time to ask 18 questions for us to answer. But if you want to ask a 19 question as part of testimony, at the end of the comment 20 period it will be included with any other comments. It will 21 be addressed then. If you'd like to make a statement, you</p>	<p>16</p> <p>1 know, it is concerning to hear about that the day after you 2 move in. Thank you. 3 MS. HEAFEY: Okay. Would anyone else like to make 4 a statement this evening? Come on up and, again, just state 5 your name and spell it for the court reporter. And either 6 this one or that one will record you. 7 MS. ZIMMER: Jessica Zimmer, J E S S I C A, Z I M 8 M E R. 9 COURT REPORTER: Thank you. 10 MS. ZIMMER: I just have a comment that I would 11 like to make. We have followed this -- 12 MS. HEAFEY: Oh, can you hear her? 13 COURT REPORTER: Just keep your voice up and we'll 14 be okay. 15 MS. ZIMMER: We have followed this crematory 16 situation since 2013. I'm a resident of Shipley's Choice. 17 We were against it then and still are now. I remember back 18 in 2013 when this first was started, the -- the owners 19 decided that at that point they would probably only be doing 20 about seven bodies, if that, in a 24-hour period. And we 21 kind of figured that later on down the line we would hear</p>

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<p>1 more about this. And here we are five years later, and it 2 looks like there's a possibility of now being able to burn 3 up to 30 bodies in a 24-hour period, which is very 4 bothersome to me.</p> <p>5 It just seems like that whole strip there beyond 6 the crematory -- I know a company that had moved out because 7 of some fumes that had gotten into his system. It seems 8 like as these businesses decide to leave that -- that strip 9 of stores that's just going to be more of an opportunity for 10 this cremation situation to just go straight down the line. 11 And probably in about five more years we'll be back here 12 again. Thank you.</p> <p>13 MS. HEAFEY: Okay. Would anyone else like to make 14 a statement for the record?</p> <p>15 MR. KAUP: Are you taking public comments?</p> <p>16 MR. PENNEY: I'm sorry?</p> <p>17 MR. KAUP: Are you taking public comments?</p> <p>18 MR. PENNEY: Yes.</p> <p>19 MS. HEAFEY: Yes, Matthew Fernandez?</p> <p>20 MR. KAUP: My name is Paul Kaup.</p> <p>21 MS. HEAFEY: Oh, okay, I've got you, too. Okay.</p>	<p>1 was an initial permit that was granted to this business to 2 allow a certain-sized unit. And now that there are 3 applications for the increase in size of the unit so that 4 they can handle more volume, therefore, putting more 5 potential products into the air. And I'm not educated or 6 versed on what -- what it is exactly that that is.</p> <p>7 But it just -- I know that we have several 8 homeowners, some that are here, that live very close to that 9 specific area. And there's nothing new that I'm going to 10 say other than I represent a community that has -- hasn't 11 liked this from the getgo. I don't think we've had one 12 supporter in the community of this business being where it 13 is. And very staunch -- just not -- not wanting it there.</p> <p>14 So, I'd like to be on record as the president of 15 the homeowners association representing everybody that's in 16 our community, 854 homes, that we haven't had a single 17 person come up in support of this and have received nothing 18 but complaints about the fact that it's there. And the fact 19 that it's going to be potentially increasing in volume just 20 doesn't make a lot of sense to us.</p> <p>21 Its proximity, it may be zoned and off of Veterans</p>
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<p>1 We'll do you first.</p> <p>2 MR. KAUP: Okay.</p> <p>3 MR. PENNEY: If you can come up to --</p> <p>4 MS. HEAFEY: Yeah, you have to speak into the 5 microphones.</p> <p>6 MR. KAUP: Sure.</p> <p>7 MS. HEAFEY: State and spell your name, please.</p> <p>8 MR. KAUP: My name is Paul Kaup, K A U P. I live 9 at 742 Mimosa Court in Millersville, Maryland 21108. I'm 10 the President of the Shipley's Choice Homeowners 11 Association. I just got word of the meeting tonight about 12 three hours ago from another homeowner who just happened to 13 share it with me. I've been the president of the homeowners 14 association since the first week in January, so I don't 15 understand why I didn't receive -- or why our organization 16 didn't receive notice of the public hearing. I'm sure 17 there's some process that just -- it just didn't happen. 18 But, so, I'm not prepared at all in that regard.</p> <p>19 I just wanted to show up because I followed -- 20 well, I followed it as a resident through the process of the 21 initial application. From my understanding is that there</p>	<p>1 Highway, which is commercial, but it backs up -- it's way 2 closer to our homes than it is to Veterans Highway, and 3 that's -- that's really -- I mean, I use Chesapeake Auto 4 Tech, that's right across the street from it. So, I know 5 exactly where this is and how the crow flies, and more 6 importantly how the wind blows. And that's it.</p> <p>7 I'll be sharing this with our homeowners. We have 8 a homeowners association meeting on Monday night. So, I'll 9 find out exactly what the comment period is for this to see 10 if there's any way we can mobilize and get some additional 11 comments to this. But just rest assured that there are a 12 handful, there's several handfuls of homeowners that are in 13 opposition to it.</p> <p>14 MS. HEAFEY: If you could stay afterward, I want 15 to verify an address. I did have something for the 16 homeowners association. So, I just want to verify what I 17 have for you.</p> <p>18 MR. KAUP: Sure. I appreciate it. Okay.</p> <p>19 MS. HEAFEY: Okay. And for the folks that came in 20 late, the comment period goes until June 8th. And you can 21 either make statements here this evening, as folks are</p>

<p>21</p> <p>1 doing, you can send comments to me in writing, either via 2 post or via e-mail. They all just need to be sent in by 3 June 8th. And there is an opportunity to request a 60-day 4 extension to the comment period. Again, that must also be 5 in writing to my attention no later than June 8th. 6 So, and I'm sorry, the next person I had, Matthew 7 Fernandez? 8 MR. FERNANDEZ: Yeah, no comment. 9 MS. HEAFEY: Okay. All right. And anybody else 10 who would like to make a statement tonight come on up. 11 Okay. And, again, if you would state your name and spell 12 it, please. 13 MS. WHITLOCK: I'm very loud. Jennifer Whitlock, 14 W H I T L O C K. And I'm at 516 Moonflower Court. And I 15 apologize because I'm incredibly ill-prepared to say 16 anything with any kind of good thought. But anyway I, too, 17 like several homeowners, and -- and Mr. Kaup, who spoke, I 18 followed this since the inception. I live probably one of 19 the houses that is closest proximity to this crematory. I 20 am in, you know, huge opposition to something that is -- has 21 a potential to impact our air quality, you know, negatively.</p>	<p>23</p> <p>1 statements. 2 MS. HEAFEY: I'm sorry? 3 MR. ZIMMER: No questions, just statements. 4 MS. HEAFEY: Again, you can ask a question as part 5 of a statement and it will be addressed. 6 MR. ZIMMER: Then I'll -- 7 MS. HEAFEY: Sure, come on up. And, again, just 8 state your name and spell it, please. 9 MR. ZIMMER: Sure. John Zimmer. My statement is 10 to the MDE. And I guess I will have to ask -- and within my 11 statement are questions that I would like to have answered. 12 First of all, let me ask you this. I just noticed we have 13 22 pages here. And I was notified of this meeting a while 14 ago, but it's difficult to consume 22 pages while you're 15 waiting for a meeting to start. I'd like to know, first of 16 all from the MDE, why you didn't sent it to me in the letter 17 you sent me so I could read these through. 18 Second question, I think that's -- you know. 19 that's -- it should have been part and parcel of the whole 20 meeting. If this were prepared, we have a syllabus, we know 21 what's going on.</p>
<p>22</p> <p>1 I have smelled and I have phoned in, you know, the 2 reporting of that smell that was definitely not of the norm. 3 I've lived in Shipley's Choice for 14 years. I have a 12- 4 and a 15-year-old. While we do live also in close proximity 5 to the fire department, it's definitely a different kind of 6 smell. So, you know, a bigger unit, more volume, you know, 7 it just has the potential to impact our community even more 8 than it already has. So, just voicing my opposition as 9 well. Thank you. 10 MS. HEAFEY: Okay. Would anyone else like to make 11 a statement? Okay. We're going to be a few more minutes, 12 obviously. And, so, if you decide you'd like to make a 13 statement, then we can be here for a few more minutes. 14 Otherwise, I will give you guys my card, which I 15 forgot to put out. And I do want to verify again everyone's 16 address who wants to receive information as this permit 17 process goes forward. I need to be sure I can read your 18 handwriting or -- and/or your e-mail and street address, 19 whichever you prefer to leave so that I can actually send 20 information out. Sir? 21 MR. ZIMMER: So, there will be no questions, just</p>	<p>24</p> <p>1 Second, I'd like to know, just briefly glancing 2 through this, I want the MDE to reply to me to tell -- let 3 me know there will be monitoring, and it will be recorded, 4 and it will be kept. But I want to know how often the MDE 5 will do the check of these recordings for the emissions. 6 Second, I want the MDE to reply to me as are the 7 most advanced filters being employed by this crematory to 8 eliminate most, if not all, harmful toxins. Well, all 9 toxins are harmful. Any harmful particulates or 10 contaminates. 11 Third, I would like to know -- it's -- you -- Mr. 12 Penney noted that the crematory will now have the 13 opportunity to burn eight bodies -- no, ten bodies in and 14 eight-hour period. I want to know is the MDE allowing for 15 the crematory to operate 24/7. 16 And, you know, I do remember back in 2013, and I'm 17 sure you were all here at the same time, as I sat next to 18 Cathy Vitale, and I heard distinctly that the owners said 19 this would be a very low-key operation based on -- I'm 20 paraphrasing here -- only a few bodies will be burned, 21 nothing major or anything like that, assuring the public</p>

<p>25</p> <p>1 that everything is going to be fine. And now we're into 2 this second crematory. How many more will there be? How 3 many more will you allow? 4 Any other questions I will forward. I would like 5 your e-mail address. 6 MS. HEAFEY: Absolutely. 7 MR. ZIMMER: And thank you very much. 8 MS. HEAFEY: Thank you. Okay. Would anyone else 9 like to make a statement this evening? Okay. 10 Okay. So, if no one else would like to make a 11 statement at tonight's hearing, I'm going to conclude the 12 hearing at 7:00 p.m. And, again, the comment period remains 13 open through June 8th. The information can be found at the 14 Glen Burnie library, 1010 Eastway. The Docket Number is 16- 15 17, or you can ask for Maryland Crematory. There's also a 16 copy of that docket at MDE headquarters in Baltimore. 17 And if you want to submit a comment, add to a 18 comment, you may do it in writing -- it has to be done in 19 writing at this point -- through e-mail or through post. 20 And I will give you my business cards as we go through. 21 And I want to thank everyone for coming out</p>	<p>27</p> <p>1 CERTIFICATE OF COURT REPORTER 2 3 I, Carol Vasques, do hereby certify that the 4 foregoing transcription was reduced to typewriting via 5 digital recording provided by me; that I am neither counsel 6 for nor, related to, nor employed by any of the parties to 7 the action in which these proceedings were transcribed; that 8 I am not a relative or employee of any attorney or counsel 9 employed by the parties hereto, nor financially or otherwise 10 interested in the outcome of the action. 11 12 13 14 15 CAROL VASQUES, COURT REPORTER 16 17 18 19 20 21</p>
<p>26</p> <p>1 tonight. And I hope we get home before the rain hits 2 really hard. I just got another warning, so be safe, 3 everybody. 4 (Whereupon, the hearing was 5 concluded at 7:00 p.m.) 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21</p>	

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